

EXHIBIT G



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October 13, 2020

VIA E-MAIL

George A. Tsougarakis
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**Re: His All Holiness Bartholomew I, et al., Princeton University, D.N.J. Civil Action
No. 3:18-cv-17195**

Dear Counsel:

As the Parties agreed, and as approved by the Honorable Zahid N. Quraishi, U.S.M.J., I write on behalf of the Trustees of Princeton University ("Princeton") to memorialize and avoid any misunderstandings regarding the rulings made by Magistrate Judge Quraishi during the telephonic discovery conference held on Friday, October 9, 2020.

Please advise by **October 16, 2020**, if Plaintiffs His All Holiness, Bartholomew, I, The Archbishop of Constantinople, New Rome and Ecumenical Patriarch (the "Patriarch"), the Holy Metropolis of Drama (the "Metropolis") and the Monastery of Theotokos Eikosiphoinissa (individually, the "Monastery" and collectively, the "Plaintiffs") disagree with the accuracy of the following recitation of rulings:

- 1. The Parties' Dispute over the Manner and Location of Depositions:** All depositions will be remote until further order of the Court. The Court noted that if the COVID-19 pandemic has sufficiently subsided by the deposition dates, it is willing to revisit this issue at that time.
- 2. Plaintiffs' Objections to Princeton's Notice to Depose the Patriarch:** The Court instructed that Princeton not take the Patriarch's personal deposition at this time, but, instead, proceed first with the depositions of the Patriarch's "representative" under Fed. R. Civ. P. 30(b)(6), and the 30(b)(6) witnesses for the Metropolis and the Monastery. Following those depositions, if necessary, the Court will consider whether the Patriarch must sit for his personal deposition.

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3. Plaintiffs' Fed. R. Civ. P. 30(b)(6) Deposition Notice of Princeton:

- a. Topic No. 1: The Court denied, in its entirety, any inquiry into Topic No. 1.
 - b. Topic No. 3: The Court limited Topic No. 3 to Princeton Library's Department of Rare Books and Special Collections policies and practices regarding the acquisition of manuscripts
 - c. Topic No. 4: The Court denied, in its entirety, any inquiry into Topic No. 4.
 - d. Topic No. 5: The Court denied any inquiry into Topic No. 5 at this time and suggested that Plaintiffs, instead, issue a subpoena to the Princeton University Press to pursue the subject discovery. If the Princeton University Press does not cooperate or if that discovery warrants reconsideration of this ruling, the Court will do so.
- 4. The Timing and Sequencing of the Parties' Respective Depositions:** This issue was resolved in the letter-briefs with both Parties asserting that they will attempt to schedule and sequence the current depositions in a fair and efficient manner, such that they all take place within a one month period. Due to the letter-brief resolution, the Court made no ruling as to this issue.
- 5. The Patriarch's and the Monastery's Identical Response to Interrogatory No. 1:** The Court ordered Plaintiffs to amend their answers to Interrogatory Nos. 1 to provide all information about Plaintiffs' counsels' and consulting experts' efforts to investigate and locate the Manuscripts. Plaintiffs are to identify the specific efforts made by counsel and any consulting experts, the substantive information learned during those efforts, and the corresponding dates of all efforts and substantive discoveries. The Court did not impose a deadline for compliance, but the Court understands compliance must precede the depositions and a progress report is expected at the next status conference on December 1, 2020.
- 6. The Metropolis' Response to Interrogatory No. 2:** The Court ordered the Metropolis to provide an answer as to when any agents of the Metropolis, as an organization or entity, first discovered Princeton's possession of the Manuscripts. If there is more information than in the current answer (*e.g.*, the identity of the author and/or publisher of the 1995 Book), the Metropolis must provide it. If there is no additional information, Plaintiffs must certify the answer is complete.

Please do not hesitate to contact me if you have any questions or would like to discuss.



George Tsougarakis
October 13, 2020
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Sincerely,

A handwritten signature in blue ink, appearing to read "S. Sneed".

Samuel C. Sneed

cc:

Eric Blumenfeld, Esq. (via e-mail)
Steven Goldfarb, Esq. (via e-mail)
Linda Wong, Esq. (via e-mail)
Stephen J. Knerly, Jr., Esq. (via e-mail)